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8 Attorney for: Plaintiff Neil Henry Edwards

12 SEP 18 PM 1:59  
CLERK U.S. DISTRICT COURT  
CENTRAL DISTRICT OF CALIF.  
LOS ANGELES  
BY: \_\_\_\_\_

FILED

9 UNITED STATES DISTRICT COURT  
10 CENTRAL DISTRICT OF CALIFORNIA

11 NEIL HENRY EDWARDS, an  
12 Individual;

CV12-08043 JLG  
Case No.:

13 Plaintiff,

14 vs.

15 TRANS UNION LLC, is business  
16 entity, form unknown; and DOES 1-10,  
17 Inclusive,

18 Defendants.

COMPLAINT FOR DAMAGES:

1. FAIR CREDIT REPORTING ACT.

JURY TRIAL DEMANDED.

19 Plaintiff alleges:

20 1. Plaintiff NEIL HENRY EDWARDS ("Plaintiff") is a resident of County  
21 of Los Angeles, State of California.

22 2. Defendants TRANSUNION LLC ("TRANSUNION"), is a business  
23 entity, forms unknown, doing business in the State of California as credit bureaus  
24 which receive negative credit information about consumers and which then  
25  
26  
27  
28

COMPLAINT FOR DAMAGES

1 publish such information in credit reports available to its subscribers.

2 Collectively, these defendants will be referred to as "credit bureau defendants" or  
3 "credit agency defendants".

4 3. Defendants DOES 1-10 are individuals and business entities, form  
5 unknown, doing business in the State of California as credit reporting agencies,  
6 debt collection agencies, creditors or other persons or entities which engage in  
7 credit reporting and/or debt collection. DOES 1-10, Inclusive, includes  
8 individuals or business entities doing business in the State of California as credit  
9 reporting agencies, debt collectors and/or creditors who have refused to delete  
10 accounts of plaintiff that were procured through identity theft, mixed file or other  
11 manner of recording an inaccurate credit account, even after plaintiff has notified  
12 them of the false or inaccurate derogatory, and also who have reported such  
13 accounts as derogatory credit references to credit reporting agencies.

14 4. Plaintiff does not know the true names and capacities, whether corporate,  
15 partnership, associate, individual or otherwise of Defendants sued herein as Does  
16 1 through 10, inclusive, under the provisions of Section 474 of the California  
17 Code of Civil Procedure. Plaintiff is informed and believes and on that basis  
18 alleges that Defendants Does 1 through 10, inclusive, are in some manner  
19 responsible for the acts, occurrences and transactions as officers, directors or  
20 managing agents of Defendants or as its agents, servants, employees and/or joint  
21 venturers and as set forth in this complaint, and that each of them are legally liable  
22 to Plaintiff, as set forth below and herein:

23 a) Said Officers, directors or managing agents of Defendants personally  
24 acted willfully with respect to the matters alleged in this complaint;

25 b) Said officers, directors or managing agents of Defendants personally  
26 authorized, approved of, adopted and/or ratified the acts alleged herein or the  
27 agents, servants, employees and/or joint venturers of Defendants did so act;

1 c) Said officers, directors or managing agents of Defendants personally  
2 participated in the acts alleged herein of Defendants;

3 d) Said Officers, directors or managing agents of Defendants personally had  
4 close supervision of their agents, servants, employees and/or joint venturers of  
5 Defendants;

6 e) Said Officers, directors or managing agents of Defendants personally  
7 were familiar with the facts regarding the matters alleged herein;

8 f) Said Officers, directors or managing agents of Defendants personally  
9 failed to investigate the circumstances appertaining to the acts alleged herein.  
10 They also failed and refused to repudiate the herein alleged actions and failed to  
11 redress the harm done to Plaintiffs. Further, said Officers, directors, or managing  
12 agents of Defendants failed and refused to punish or discharge the said agents,  
13 servants, employees and/or joint venturers of Defendants, even after learning of  
14 the acts of the agents, servants, employees and/or joint venturers of Defendants.  
15 Plaintiffs will seek leave to amend this complaint to set forth the true names and  
16 capacities of said fictitiously named Defendants as enumerated above, together  
17 with appropriate charging allegations, when learned.

18 5. Plaintiff is informed and believes, and thereon allege that at all relevant  
19 times herein each Defendant, whether actually or fictitiously named, was the  
20 principal, joint venturer, agent, servant or employee of each other Defendant, and  
21 in acting as such within the course, scope and authority of such relationship, took  
22 some part in the acts and omissions hereinafter set forth, by reason of which each  
23 Defendant is liable to Plaintiff for the relief prayed for in this complaint, and any  
24 future amended complaint. Further, Plaintiff alleges that each act alleged herein,  
25 whether by a named Defendants or fictitiously named Defendants or otherwise,  
26 was expressly authorized or ratified, as these terms are used in California Civil  
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1 Code Section 3294(b), by each and every other Defendant herein, whether named  
2 or fictitiously named.

3  
4 **FIRST CAUSE OF ACTION**

5 **[VIOLATION OF THE FAIR CREDIT REPORTING ACT**  
6 **AGAINST ALL DEFENDANTS]**

7 6. Plaintiff re-alleges and incorporates all preceding paragraphs as though  
8 set forth in full in this cause of action.

9 7. Plaintiff is a consumer as this term is defined by 15 U.S.C. Sec. 1681a(c)  
10 of the Fair Credit Reporting Act. TRANSUNION is a credit bureau defendant  
11 who is "consumer reporting agencies" as that term is defined in 15 U.S.C. Section  
12 1681a (f).

13 8. On or about December 2011, Plaintiff discovered that TRANSUNION  
14 was reporting a State Tax Lien from Baltimore Maryland on his personal credit  
15 profile. Plaintiff has never lived in the state of Maryland. Plaintiff has disputed  
16 this tax lien several times to no avail.

17 9. On or about January 14, 2012, Plaintiff sent a certified letter to  
18 TRANSUNION disputing the Baltimore Maryland State Tax Lien erroneously  
19 appearing on his credit profile.

20 10. On or about January 30, 2012, Plaintiff sent a certified letter to  
21 TRANSUNION disputing the Baltimore Maryland State Tax Lien erroneously  
22 appearing on his credit profile.

23 11. On or about February 14, 2012, Plaintiff received a response from  
24 TRANSUNION stating that they had verified the Baltimore Maryland State Tax  
25 Lien and no change would be made.

26 12. On or about April 24, 2012, Plaintiff received a response from  
27 TRANSUNION stating that they had verified the Baltimore Maryland State Tax  
28

1 Lien and no change would be made.

2 13. On or about April 30, 2012, Plaintiff received a response from  
3 TRANSUNION stating that they had verified the Baltimore Maryland State Tax  
4 Lien and no change would be made. Furthermore, TRANSUNION stated that they  
5 now considered Plaintiff's dispute frivolous and they would not re-investigate the  
6 matter further.

7 14. On or about May 15, 2012, Plaintiff sent a dispute letter to Baltimore  
8 County Courts, 401 Bosley Avenue, Towson, MD 21204 to dispute the State Tax  
9 Lien appearing on his credit report in the amount of \$1,819.00.

10 15. On or about May 25, 2012, Plaintiff received a response from  
11 TRANSUNION stating that they had verified the Baltimore Maryland State Tax  
12 Lien and no change would be made. Furthermore, TRANSUNION stated that they  
13 considered Plaintiff's dispute frivolous and they would not re-investigate the  
14 matter further.

15 16. On or about May 25, 2012, Plaintiff sent a letter to TRANSUNION  
16 disputing the Baltimore Maryland State Tax Lien erroneously appearing on his  
17 credit profile.

18 17. On or about May 30, 2012, Plaintiff received a response from  
19 TRANSUNION stating that they had verified the Baltimore Maryland State Tax  
20 Lien and no change would be made. This letter also stated that they had previously  
21 verified the Baltimore Maryland State Tax Lien as accurate and therefore  
22 considered his dispute frivolous.

23 18. On or about June 22, 2012, Plaintiff received a response from  
24 TRANSUNION stating that they had verified the Baltimore Maryland State Tax  
25 Lien and no change would be made.

26 19. On or about July 27, 2012, Plaintiff received a response from  
27 TRANSUNION stating that they had verified the Baltimore Maryland State Tax  
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1 Lien and no change would be made.

2 20. On or about September 10, 2012, Plaintiff received a response from  
3 TRANSUNION stating that their investigation into the mixed file was complete.  
4 The result was that the Baltimore Maryland State Tax Lien was verified and no  
5 change would be made.

6 21. Defendant, TRANSUNION has refused, despite Plaintiff's phone calls  
7 and letters to acknowledge that he is not responsible for the Baltimore Maryland  
8 State Tax Lien account.

9 22. Plaintiff sent correspondence to TRANSUNION asking that they  
10 reinvestigate his account cease any negative credit reporting and remove the  
11 Baltimore Maryland State Tax Lien account from his credit profile.

12 23. Plaintiff complied with all requests of each of the Defendants to  
13 provide information in order to have the erroneous marks removed from his credit  
14 reports. Despite the insistence of Plaintiff, the Defendants, and each of them,  
15 failed to correct the errors and failed to undertake sufficient investigations upon  
16 being notified of the errors.

17 24. Within the past several years, Defendants, and each of them, willfully  
18 violated the provisions of the Fair Credit Reporting Act in *at least* the following  
19 respects:

20 a. By willfully and negligently failing, in the preparation of the consumer  
21 report concerning Plaintiff, to follow reasonable procedures to assure maximum  
22 possible accuracy of the information in the report;

23 b. By willfully and negligently failing to correct, after receiving ample  
24 notice, information about the Plaintiff which defendants knew, or should have  
25 known, was incomplete and/or inaccurate;

26 c. By willfully and negligently failing to correct and/or delete the  
27 incomplete and inaccurate information in Plaintiff's file after conducting an  
28

1 investigation;

2 d. By willfully and negligently failing to conduct an adequate investigation  
3 of Plaintiff's complaints, and by willfully and negligently failing to implement  
4 corrective actions once the outcome of such investigations were known, or should  
5 have been known, to the defendants; and,

6 25. As a proximate result of the actions of the Defendants, and each of  
7 them, Plaintiff has been damaged in an amount which will be proven at time of  
8 trial. As provided under the cited law, Plaintiff is entitled to actual damages, pain  
9 and suffering, punitive damages, penalties, costs and attorney fees.

10 26. Plaintiff alleges that defendants, and each of them, have willfully  
11 violated FCRA with respect to Plaintiff and towards others similarly situated.  
12 Specifically, defendants deliberately have inefficient procedures for correcting  
13 their credit files, because they know that a certain number of consumers will either  
14 be intimidated or too frustrated to continuously fight back against the constant  
15 onslaught of collection activities for invalid debts. Defendants, and each of them,  
16 know that a certain number of consumers would rather pay than fight, even if the  
17 debt is not actually owed. These defendants know that their systems intimidate  
18 consumers so they'll pay debts even if not valid or not completely valid. These  
19 facts were not disclosed to the Plaintiff and are not disclosed to the borrowing  
20 public at large.


21  
22 WHEREFORE, Plaintiff prays for judgment as follows:

- 23 1. For general and special damages according to proof at trial;  
24 2. For statutory penalties for each separate statutory violation where  
25 allowed by statute;  
26 3. For punitive damages against defendants according to proof at trial and  
27 using the applicable punitive damages standards from the involved statutes;  
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- 1 4. For attorney's fees where authorized by statute or law;
- 2 5. For costs of suit;
- 3 6. For such other relief as the court deems just and proper.
- 4

5 **PLAINTIFF DEMANDS A JURY TRIAL**

6 Dated: September 17 2012 **ROBERT F. BRENNAN, A P.C.**

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8 By:   
9 Robert F. Brennan  
10 Attorneys for Plaintiff  
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Robert F. Brennan SBN 132449  
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UNITED STATES DISTRICT COURT  
 CENTRAL DISTRICT OF CALIFORNIA

NEIL HENRY EDWARDS, an Individual;

CASE NUMBER

PLAINTIFF(S)

CV12-08043 JCG

v.

TRANS UNION LLC, is business entity, form  
 unknown; and DOES 1-10, Inclusive,

DEFENDANT(S).

SUMMONS

TO: DEFENDANT(S): \_\_\_\_\_

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it), you must serve on the plaintiff an answer to the attached ☒ complaint ☐ amended complaint ☐ counterclaim ☐ cross-claim or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff's attorney, Robert F. Brennan, whose address is 3150 Montrose Ave. La Crescenta CA 91214. If you fail to do so, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

SEP 18 2012

Dated: \_\_\_\_\_

Clerk, U.S. District Court

By: \_\_\_\_\_

Deputy Clerk

(Seal of the Court)

[Use 60 days if the defendant is the United States or a United States agency, or is an officer or employee of the United States. Allowed 60 days by Rule 12(a)(3)].

**UNITED STATES DISTRICT COURT, CENTRAL DISTRICT OF CALIFORNIA  
CIVIL COVER SHEET**

<b>I (a) PLAINTIFFS</b> (Check box if you are representing yourself <input type="checkbox"/> NEIL HENRY EDWARDS an individual;	<b>DEFENDANTS</b> TRANS UNION LLC, is a business entity, form unknown; and DOES 1-10, Inclusive,
<b>(b) County of Residence of First Listed Plaintiff</b> (Except in U.S. Plaintiff Cases): Los Angeles County.	<b>County of Residence of First Listed Defendant</b> (In U.S. Plaintiff Cases Only): Los Angeles, California
<b>(c) Attorneys</b> (Firm Name, Address and Telephone Number. If you are representing yourself, provide same.) Robert F. Brennan, Esq. SBN 132449 LAW OFFICES OF ROBERT F. BRENNAN A.P.C. 3150 Montrose Ave. La Crescenta, CA 91214 Telephone 818-249-5291	<b>Attorneys</b> (If Known)

<b>II. BASIS OF JURISDICTION</b> (Place an X in one box only.)  <input type="checkbox"/> 1 U.S. Government Plaintiff <input checked="" type="checkbox"/> 3 Federal Question (U.S. Government Not a Party)  <input type="checkbox"/> 2 U.S. Government Defendant <input type="checkbox"/> 4 Diversity (Indicate Citizenship of Parties in Item III)	<b>III. CITIZENSHIP OF PRINCIPAL PARTIES - For Diversity Cases Only</b> (Place an X in one box for plaintiff and one for defendant.)  <table style="width:100%;"> <tr> <td style="width:33%;">Citizen of This State</td> <td style="width:10%;">PTF <input type="checkbox"/> 1</td> <td style="width:10%;">DEF <input type="checkbox"/> 1</td> <td style="width:33%;">Incorporated or Principal Place of Business in this State</td> <td style="width:10%;">PTF <input type="checkbox"/> 4</td> <td style="width:10%;">DEF <input type="checkbox"/> 4</td> </tr> <tr> <td>Citizen of Another State</td> <td>PTF <input type="checkbox"/> 2</td> <td>DEF <input type="checkbox"/> 2</td> <td>Incorporated and Principal Place of Business in Another State</td> <td>PTF <input type="checkbox"/> 5</td> <td>DEF <input type="checkbox"/> 5</td> </tr> <tr> <td>Citizen or Subject of a Foreign Country</td> <td>PTF <input type="checkbox"/> 3</td> <td>DEF <input type="checkbox"/> 3</td> <td>Foreign Nation</td> <td>PTF <input type="checkbox"/> 6</td> <td>DEF <input type="checkbox"/> 6</td> </tr> </table>	Citizen of This State	PTF <input type="checkbox"/> 1	DEF <input type="checkbox"/> 1	Incorporated or Principal Place of Business in this State	PTF <input type="checkbox"/> 4	DEF <input type="checkbox"/> 4	Citizen of Another State	PTF <input type="checkbox"/> 2	DEF <input type="checkbox"/> 2	Incorporated and Principal Place of Business in Another State	PTF <input type="checkbox"/> 5	DEF <input type="checkbox"/> 5	Citizen or Subject of a Foreign Country	PTF <input type="checkbox"/> 3	DEF <input type="checkbox"/> 3	Foreign Nation	PTF <input type="checkbox"/> 6	DEF <input type="checkbox"/> 6
Citizen of This State	PTF <input type="checkbox"/> 1	DEF <input type="checkbox"/> 1	Incorporated or Principal Place of Business in this State	PTF <input type="checkbox"/> 4	DEF <input type="checkbox"/> 4														
Citizen of Another State	PTF <input type="checkbox"/> 2	DEF <input type="checkbox"/> 2	Incorporated and Principal Place of Business in Another State	PTF <input type="checkbox"/> 5	DEF <input type="checkbox"/> 5														
Citizen or Subject of a Foreign Country	PTF <input type="checkbox"/> 3	DEF <input type="checkbox"/> 3	Foreign Nation	PTF <input type="checkbox"/> 6	DEF <input type="checkbox"/> 6														

**IV. ORIGIN** (Place an X in one box only.)

<input checked="" type="checkbox"/> 1 Original Proceeding	<input type="checkbox"/> 2 Removed from State Court	<input type="checkbox"/> 3 Remanded from Appellate Court	<input type="checkbox"/> 4 Reinstated or Reopened	<input type="checkbox"/> 5 Transferred from another district (specify):	<input type="checkbox"/> 6 Multi-District Litigation	<input type="checkbox"/> 7 Appeal to District Judge from Magistrate Judge
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**V. REQUESTED IN COMPLAINT: JURY DEMAND:** ☒ Yes    ☐ No (Check 'Yes' only if demanded in complaint.)

**CLASS ACTION** under F.R.C.P. 23: ☐ Yes    ☒ No    **MONEY DEMANDED IN COMPLAINT:** \$ 300,000

**VI. CAUSE OF ACTION** (Cite the U.S. Civil Statute under which you are filing and write a brief statement of cause. Do not cite jurisdictional statutes unless diversity.)  
 Fair Credit Reporting Act 15 U.S.C. Sec. 1681

**VII. NATURE OF SUIT** (Place an X in one box only.)

<b>OTHER STATUTES</b> <input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce/ICC Rates/etc. <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input checked="" type="checkbox"/> 480 Consumer Credit <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 810 Selective Service <input type="checkbox"/> 850 Securities/Commodities /Exchange <input type="checkbox"/> 875 Customer Challenge 12 USC 3410 <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Act <input type="checkbox"/> 892 Economic Stabilization Act <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 894 Energy Allocation Act <input type="checkbox"/> 895 Freedom of Info. Act <input type="checkbox"/> 900 Appeal of Fee Determination Under Equal Access to Justice <input type="checkbox"/> 950 Constitutionality of State Statutes	<b>CONTRACT</b> <input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loan (Excl. Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise <b>REAL PROPERTY</b> <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	<b>TORTS</b> <b>PERSONAL INJURY</b> <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Fed. Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury <input type="checkbox"/> 362 Personal Injury-Med Malpractice <input type="checkbox"/> 365 Personal Injury-Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability	<b>TORTS</b> <b>PERSONAL PROPERTY</b> <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability <b>BANKRUPTCY</b> <input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 <b>CIVIL RIGHTS</b> <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 444 Welfare <input type="checkbox"/> 445 American with Disabilities - Employment <input type="checkbox"/> 446 American with Disabilities - Other <input type="checkbox"/> 440 Other Civil Rights	<b>PRISONER PETITIONS</b> <input type="checkbox"/> 510 Motions to Vacate Sentence <input type="checkbox"/> 530 General Habeas Corpus <input type="checkbox"/> 535 Death Penalty <input type="checkbox"/> 540 Mandamus/Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition <b>FORFEITURE/PENALTY</b> <input type="checkbox"/> 610 Agriculture <input type="checkbox"/> 620 Other Food & Drug <input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 630 Liquor Laws <input type="checkbox"/> 640 R.R. & Truck <input type="checkbox"/> 650 Airline Regs <input type="checkbox"/> 660 Occupational Safety /Health <input type="checkbox"/> 690 Other	<b>LABOR</b> <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Mgmt. Relations <input type="checkbox"/> 730 Labor/Mgmt. Reporting & Disclosure Act <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Empl. Ret. Inc. Security Act <b>PROFESSIONS</b> <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 840 Trademark <b>SOLE AGENTS</b> <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g)) <b>FEDERAL TAXES</b> <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS-Third Party 26 USC 7609
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**VIII(a). IDENTICAL CASES:** Has this action been previously filed and dismissed, remanded or closed? ☒ No    ☐ Yes

If yes, list case number(s):

**FOR OFFICE USE ONLY:** Case Number: **CV12-08043**

**UNITED STATES DISTRICT COURT, CENTRAL DISTRICT OF CALIFORNIA  
CIVIL COVER SHEET**

AFTER COMPLETING THE FRONT SIDE OF FORM CV-71, COMPLETE THE INFORMATION REQUESTED BELOW.

**VIII(b). RELATED CASES:** Have any cases been previously filed that are related to the present case? ☒ No ☐ Yes

If yes, list case number(s): \_\_\_\_\_

Civil cases are deemed related if a previously filed case and the present case:

- (Check all boxes that apply) ☐ A. Arise from the same or closely related transactions, happenings, or events; or  
☐ B. Call for determination of the same or substantially related or similar questions of law and fact; or  
☐ C. For other reasons would entail substantial duplication of labor if heard by different judges; or  
☐ D. Involve the same patent, trademark or copyright, and one of the factors identified above in a, b or c also is present.

**IX. VENUE:** List the California County, or State if other than California, in which EACH named plaintiff resides (Use an additional sheet if necessary)

- ☐ Check here if the U.S. government, its agencies or employees is a named plaintiff.  
 Los Angeles, California

List the California County, or State if other than California, in which EACH named defendant resides. (Use an additional sheet if necessary).

- ☐ Check here if the U.S. government, its agencies or employees is a named defendant.  
 TRANS UNION - California

List the California County, or State if other than California, in which EACH claim arose. (Use an additional sheet if necessary)

- Note: In land condemnation cases, use the location of the tract of land involved.  
 Los Angeles County

**X. SIGNATURE OF ATTORNEY (OR PRO PER):** \_\_\_\_\_

Date Sept. 18, 2012

Notice to Counsel/Parties: The CV-71 (JS-44) Civil Cover Sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law. This form, approved by the Judicial Conference of the United States in September 1974, is required pursuant to Local Rule 3-1 is not filed but is used by the Clerk of the Court for the purpose of statistics, venue and initiating the civil docket sheet. (For more detailed instructions, see separate instructions sheet.)

Key to Statistical codes relating to Social Security Cases:

Nature of Suit Code	Abbreviation	Substantive Statement of Cause of Action
861	HIA	All claims for health insurance benefits (Medicare) under Title 18, Part A, of the Social Security Act, as amended. Also, include claims by hospitals, skilled nursing facilities, etc., for certification as providers of services under the program. (42 U.S.C. 1935FF(b))
862	BL	All claims for "Black Lung" benefits under Title 4, Part B, of the Federal Coal Mine Health and Safety Act of 1969. (30 U.S.C. 923)
863	DIWC	All claims filed by insured workers for disability insurance benefits under Title 2 of the Social Security Act, as amended; plus all claims filed for child's insurance benefits based on disability. (42 U.S.C. 405(g))
863	DIWW	All claims filed for widows or widowers insurance benefits based on disability under Title 2 of the Social Security Act, as amended. (42 U.S.C. 405(g))
864	SSID	All claims for supplemental security income payments based upon disability filed under Title 16 of the Social Security Act, as amended.
865	RSI	All claims for retirement (old age) and survivors benefits under Title 2 of the Social Security Act, as amended. (42 U.S.C. (g))